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★ SEP 7 2004 ★

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

BROOKLYN OFFICE

- - - - - X

UNITED STATES OF AMERICA

I N D I C T M E N T

- against -

JEROME MARTIN, also known as
"Black,"
JOHN MARTIN, also known as
"John-John" and "Little John,"
JERROD MARTIN, also known as
"Porky,"
WILLIAM BRADLEY, also known as
"Q,"
CHRISTOPHER BRADLEY,
DERRICK BRADLEY, also known as
"Step,"
JERRY BRADLEY, also known as
"Pudge,"
TIMOTHY CLEMONS, also known as
"Pretty" and "Randy,"
JERMAINE STROMAN, also known as
"Wee-Wee,"
JAMEL WILLIAMS, also known as
"Trouble,"
BRANDON WASHINGTON, also known as
"Beezo,"
HITIYA MCCLINTON,
TREVOR JONES, also known as
"Hands,"
ANDREW HALL,
MICKELA SMOKE, also known as
"Kela,"
LENORA GIBBS, also known as
"L," and
KELVIN MATTHEWS,

Cr. No. 03-795 (S-1) (DGT)
(T. 21, U.S.C., §§
841(a)(1),
841(b)(1)(A)(iii),
841(b)(1)(C), 846,
861(a)(1) and 861(b);
T. 18, U.S.C.,
§§ 924(c)(1)(A)(i),
2 and 3551 et seq.)

Defendants.

- - - - - X

THE GRAND JURY CHARGES:

COUNT ONE

1. In or about and between January 1999 and October 2003, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants JEROME MARTIN, also known as "Black," JOHN MARTIN, also known as "John-John" and "Little John," JERROD MARTIN, also known as "Porky," WILLIAM BRADLEY, also known as "Q," CHRISTOPHER BRADLEY, DERRICK BRADLEY, also known as "Step," JERRY BRADLEY, also known as "Pudge," TIMOTHY CLEMONS, also known as "Pretty" and "Randy," JERMAINE STROMAN, also known as "Wee-Wee," JAMEL WILLIAMS, also known as "Trouble," BRANDON WASHINGTON, also known as "Beezo," HITIYA MCCLINTON, TREVOR JONES, also known as "Hands," ANDREW HALL, MICKELA SMOKE, also known as "Kela," LENORA GIBBS, also known as "L," and KELVIN MATTHEWS, together with others, did knowingly and intentionally conspire to distribute and to possess with intent to distribute a controlled substance, which offense involved 50 grams or more of a substance containing cocaine base, a Schedule II controlled substance, in violation of Section 841(a)(1) of Title 21 of the United States Code.

(Title 21, United States Code, Sections 846 and 841(b)(1)(A)(iii); Title 18, United States Code, Sections 3551 et seq.)

COUNT TWO

2. In or about and between February 1999 and January 2000, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants JERROD

MARTIN, also known as "Porky," JOHN MARTIN, also known as "John-John" and "Little John," and WILLIAM BRADLEY, also known as "Q," being persons over eighteen years of age, did knowingly and intentionally employ, hire, use, persuade, induce, entice and coerce a person under eighteen years of age to distribute a controlled substance, which offense involved a substance containing cocaine base, a Schedule II controlled substance, in violation of Section 841(a)(1) of Title 21 of the United States Code.

(Title 21, United States Code, Sections 861(a)(1), 861(b) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT THREE

3. On or about June 17, 2003, within the Eastern District of New York and elsewhere, the defendants JERROD MARTIN, also known as "Porky," JOHN MARTIN, also known as "John-John" and "Little John," and WILLIAM BRADLEY, also known as "Q," did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved 50 grams or more of a substance containing cocaine base, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(iii); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT FOUR

4. In or about and between January 1999 and October 2003, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants JEROME MARTIN, also known as "Black," JOHN MARTIN, also known as "John-John" and "Little John," JERROD MARTIN, also known as "Porky," WILLIAM BRADLEY, also known as "Q," CHRISTOPHER BRADLEY, TIMOTHY CLEMONS, also known as "Pretty" and "Randy," JERMAINE STROMAN, also known as "Wee-Wee," JAMEL WILLIAMS, also known as "Trouble," and BRANDON WASHINGTON, also known as "Beezo," did knowingly and intentionally use and carry firearms during and in relation to a drug trafficking crime, to wit: the crime charged in Count One, and did knowingly and intentionally possess firearms in furtherance of said drug trafficking crime.

(Title 18, United States Code, Sections 924(c)(1)(A)(i), 2 and 3551 et seq.)

ADDITIONAL ALLEGATIONS AS TO COUNT ONE

5. The allegations contained in Count One are hereby realleged and incorporated as if fully set forth in this paragraph, and the additional allegations below are incorporated by reference into Count One.

6. Based on (a) acts and omissions committed, aided, abetted, counseled, commanded, induced, procured, and willfully caused by the defendants JEROME MARTIN, also known as

"Black," JOHN MARTIN, also known as "John-John" and "Little John," JERROD MARTIN, also known as "Porky," WILLIAM BRADLEY, also known as "Q," CHRISTOPHER BRADLEY, DERRICK BRADLEY, also known as "Step," JERRY BRADLEY, also known as "Pudge," TIMOTHY CLEMONS, also known as "Pretty" and "Randy," JERMAINE STROMAN, also known as "Wee-Wee," JAMEL WILLIAMS, also known as "Trouble," BRANDON WASHINGTON, also known as "Beezo," HITIYA MCCLINTON, TREVOR JONES, also known as "Hands," ANDREW HALL, MICKELA SMOKE, also known as "Kela," LENORA GIBBS, also known as "L," and KELVIN MATTHEWS, and (b) all reasonably foreseeable acts and omissions of others in furtherance of a criminal plan, scheme, endeavor, and enterprise undertaken by the defendants in concert with others; all of which occurred during the commission of the offense of conviction, in preparation for that offense, and in the course of attempting to avoid detection and responsibility for that offense, the following conduct occurred (U.S.S.G. § 1B1.3(a)(1)):

a. The offense involved at least 1.5 kilograms of cocaine base (U.S.S.G. § 2D1.1(c)(1)).

b. The offense involved the possession of a dangerous weapon (U.S.S.G. § 2D1.1(b)(1)).

7. Defendants JEROME MARTIN, also known as "Black," JOHN MARTIN, also known as "John-John" and "Little John," and JERROD MARTIN, also known as "Porky," were organizers

and leaders of a criminal activity that involved five or more participants and was otherwise extensive (U.S.S.G. § 3B1.1(a)).

8. Defendants WILLIAM BRADLEY, also known as "Q," CHRISTOPHER BRADLEY, DERRICK BRADLEY, also known as "Step," JERRY BRADLEY, also known as "Pudge," TIMOTHY CLEMONS, also known as "Pretty" and "Randy," JERMAINE STROMAN, also known as "Wee-Wee," JAMEL WILLIAMS, also known as "Trouble," and BRANDON WASHINGTON, also known as "Beezo," were managers and supervisors of a criminal activity that involved five or more participants and was otherwise extensive (U.S.S.G. § 3B1.1(b)).

ADDITIONAL ALLEGATIONS AS TO COUNT TWO

9. The allegations contained in Count Two are hereby realleged and incorporated as if fully set forth in this paragraph, and the additional allegations below are incorporated by reference into Count Two.

10. Based on (a) acts and omissions committed, aided, abetted, counseled, commanded, induced, procured, and willfully caused by the defendants JERROD MARTIN, also known as "Porky," JOHN MARTIN, also known as "John-John" and "Little John," and WILLIAM BRADLEY, also known as "Q," and (b) all reasonably foreseeable acts and omissions of others in furtherance of a criminal plan, scheme, endeavor, and enterprise undertaken by the defendants in concert with others; all of which occurred during the commission of the offense of conviction, in preparation for that offense, and in the course of attempting to avoid detection

and responsibility for that offense, the following conduct occurred (U.S.S.G. § 1B1.3(a)(1)):

a. The offense involved at least 1.5 kilograms of cocaine base (U.S.S.G. § 2D1.1(c)(1)).

b. The offense involved underage individuals (U.S.S.G. § 2D1.2(a)(1)).

11. Defendants JOHN MARTIN, also known as "John-John" and "Little John," and JERROD MARTIN, also known as "Porky," were organizers and leaders of a criminal activity that involved five or more participants and was otherwise extensive (U.S.S.G. § 3B1.1(a)).

12. Defendant WILLIAM BRADLEY, also known as "Q," was a manager and supervisor of a criminal activity that involved five or more participants and was otherwise extensive (U.S.S.G. § 3B1.1(b)).

A TRUE BILL



Foreperson


ROSLYNN R. MAUSKOPF
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK
CRIMINAL *Division*

THE UNITED STATES OF AMERICA

v.s.

JEROME MARTIN, *aka* "Black," JOHN MARTIN, *aka* "John-John" and "Little John,"
JERRORD MARTIN, *aka* "Ponky," WILLIAM BRADLEY, *aka* "Q,"
CHRISTOPHER BRADLEY, DERRICK BRADLEY, *aka* "Step,"
JERRY BRADLEY, *aka* Pudge," TIMOTHY CLEMONS, *aka* "Pretty" and "Randy,"
JERMAINE STROMAN, *aka* "Wee-Wee," JAMEL WILLIAMS, *aka* "Trouble,"
BRANDON WASHINGTON, *aka* "Beezo," HITYA MCCLINTON,
TREVOR JONES, *aka* "Hands," ANDREW HALL, MICELLA SMOKE, *aka* "Kela,"
LENORA GIBBS, *aka* "I," and KELVIN MATTHEWS,

Defendants.

INDICTMENT

(T. 21 U.S.C., §§ 841(a)(1), 841(b)(1)(A)(iii), 841(b)(1)(C)
846, 861(a)(1) and 861(b); T. 18, U.S.C. §§ 924(c)(1)(A)(i),
2 and 3551 *et seq.*)

A true bill
Jerome D. Bradley - 9-7-CV-
Foreman

Filed in open court this _____ day,

of _____ A.D. 19____

Clerk

Bail, \$ _____

TODD HARRISON, AUSA
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